

**EXHIBIT ;**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF MONROE MCCLAIN**

I, Monroe McClain, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am Black male, over the age of 18, have knowledge of the matters set forth herein, and could testify competently to them if called as a witness.
  
2. I am presently employed by Universal Protection Service, LP d/b/a Allied Universal Security Services (“Allied Universal”) as an Account Manager based in the Houston branch office. Prior to becoming an Account Manager, I continuously held the position of Regional Trainer from November 11, 2015, through May 30, 2024.
  
3. As a Regional Trainer, I helped develop and facilitate the Elite training program. This training was initially rolled out in September 2021, in response to operational needs for serving the H-E-B account, a regional grocery store chain. The training provides comprehensive instruction on Allied Universal’s policies and procedures for security professionals, including its Use of Force (“UOF”) Policy, and requires classroom instruction, field training (*e.g.*, firing range), and proficiency certifications. I personally trained Client Manager Patrick Freeney and Twana Ahmed in or about early-mid January 2022.

4. In my role as Regional Trainer, I also served as the Houston branch office armorer responsible for the assembly, testing, and repair of all service issued firearms. As armorer, I had full access to Allied Universal's inventory and related records. During my employment, no malfunctioning or otherwise inoperable firearm was ever issued to any employee. Mr. Ahmed was issued a brand-new, company standard issued Glock 9mm that he was certified using during the Elite training program. Mr. Ahmed never complained to me or made me aware of any malfunction or concern with his issued firearm, nor did anyone complain on his behalf.

5. Although Elite security professionals were prioritized, body worn cameras were not standard issue and Allied Universal had run out due to supply shortages at that time. As a result, many Elite security professionals, including Mr. Ahmed, did not receive a body worn camera. I was not made aware of, nor did Mr. Ahmed ever mention to me, any issues related to him not receiving a body worn camera.

6. I have specific knowledge of Allied Universal's policies concerning the prevention of harassment, discrimination, and retaliation. I am familiar with the various reporting methods available to all employees including the employee hotline. I reported all known, perceived, or otherwise identified complaints of unfair or alleged unlawful conduct.

7. I am also knowledgeable and familiar with Allied Universal's personal appearance and grooming standards. Employees are permitted to wear facial hair, including beards that are neat and trimmed. Allied Universal provides medical and religious accommodations to this policy. I consistently wear facial hair without any accommodation, and at no point was I asked to shave it.

8. As Regional Trainer, I had regular opportunities to observe Mr. Ahmed while he was employed, and he consistently wore a beard. I never requested that he shave his beard, nor did he complain to me that someone requested him to shave his beard.

9. While Mr. Ahmed was employed with Allied Universal, I was not made aware of, nor did he ever mention to me, his race, ancestry, ethnicity, national origin, or that he practiced any specific religion. I never knew, nor did he mention that he is of Kurdish descent.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and under the laws of the United States of America, that the foregoing is true and correct, except as to matters stated to be based on information and belief.

FURTHER DECLARANT SAYETH NOT.

Executed on November <sup>15.00</sup>\_\_\_\_\_, 2024.

Signed by:

*Monroe McClain*

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Monroe McClain

Account Manager

Universal Protection Service, LP d/b/a Allied  
Universal Security Services